

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Hongmei Sun

Debtor.

Case No. 18-54473

Chapter 13

Hon. Maria Oxholm

**DEBTOR'S MOTION TO EXTEND STAY BEYOND 30
DAYS PURSUANT TO 11 USC §362(C)(3)(B)**

1. The Debtor is an individual who had a pending case within the previous year that was dismissed, other than a case refilled under 11 USC §707(b).
1. The Debtor's prior Chapter 13 Case No. 08-66214, was filed on February 16, 2018, and dismissed on June 8, 2018
2. The Debtor's present case is filed in good faith, and a Chapter 13 Plan will be timely filed. The Debtor offers the following evidence to rebut the presumption of filing not in good faith: Debtor's previous case was dismissed for failure to provide tax returns. Debtor has since filed her 2016 and 2017 tax returns and a copy will be provided to the Chapter 13 trustee immediately.
3. A proposed order is attached as Exhibit A.

WHEREFORE, Debtor respectfully requests that the Court continue the automatic stay beyond the thirtieth day following the filing of this case and impose such conditions and limitations upon the automatic stay as set forth in this motion, and grant such other relief as the court in equity deems appropriate under the circumstances.

Dated: 10/25/18

/s/Joseph Bernwanger
Frego & Associates - The
Bankruptcy Law Office, PLC
23843 Joy Road
Dearborn Heights, MI 48127
(313) 724-5088
Fregolaw@aol.com
James P. Frego P55727

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Hongmei Sun

Debtor.

Case No. 18-54473
Chapter 13
Hon. Maria Oxholm

ORDER EXTENDING AUTOMATIC STAY BEYOND 30 DAYS

Debtor having filed a Motion to Extend the Automatic Stay beyond 30 days, all interested parties having received Notice, a Certificate of No Response having been filed, a hearing having been held, and the Court being more fully advised;

IT IS HEREBY ORDERED:

- 1 **The Automatic Stay, as provided for in 11 U.S.C. Section 362 is hereby extended beyond 30 days from the date of the Order for Relief, and extended indefinitely during this Chapter 13 case until further Order of This Court.**